

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

<b>The City of Huntington, Plaintiff,</b> <b>v.</b>  <b>AmerisourceBergen Drug Corporation, et al. Defendants.</b>	Civil Action No. 3:17-01362 Hon. David A. Faber
<b>Cabell County Commission, Plaintiff,</b> <b>v.</b>  <b>AmerisourceBergen Drug Corporation, et al. Defendants.</b>	Civil Action No. 3:17-01665 Hon. David A. Faber

**NOTICE OF REMOTE VIDEOTAPED DEPOSITION OF JAMES GELDHOF**

**PLEASE TAKE NOTICE** that, pursuant to the applicable Federal Rules of Civil Procedure and the Deposition Protocol governing this litigation, Defendants, by and through undersigned counsel, will take the remote, oral, videotaped deposition of **James Geldhof**, on **September 22, 2020**, beginning at **9:00 a.m. Eastern Standard Time**. Court reporting services and video recording services will be provided by Veritext Legal Solutions via alternative video teleconferencing (VTC) services (Zoom). Parties who wish to access the deposition by phone may dial in using conference call number **646-568-7788** and access code **8030287568**.

The deposition shall be videotaped and recorded stenographically and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The oral examination is to be taken for purposes of discovery, for use at trial, or for such other purposes as are permitted under the Federal Rules of Civil Procedure, the local rules of the United States District Court for the Southern District of West Virginia, and all Pretrial Orders and Case Management Orders entered by the Court.

Dated: August 31, 2020

Respectfully submitted,

/s/ Jeffrey M. Wakefield

Jeffrey M. Wakefield (WVSB #3894)  
jwakefield@flahertylegal.com  
Jason L. Holliday (WVSB #12749)  
jholliday@flahertylegal.com  
FLAHERTY SENSABAUGH BONASSO PLLC  
P.O. Box. 3843  
Charleston, WV 25338-3843  
Telephone: (304) 345-0200

/s/ Mark H. Lynch

Geoffrey E. Hobart  
Mark H. Lynch  
Christian J. Pistilli  
Laura Flahive Wu  
COVINGTON & BURLING LLP  
One CityCenter  
850 Tenth Street NW Washington, DC 20001  
Tel: (202) 662-5281  
ghobart@cov.com  
mlynch@cov.com  
cpistilli@cov.com  
lflahivewu@cov.com

*Counsel for McKesson Corporation*

**CERTIFICATE OF SERVICE**

The undersigned counsel hereby certifies that on 31st day of August, 2020, the forgoing was served using the Court's CM/ECF system, which will send notification of such filing to all counsel of record, and via electronic mail at [mdl2804discovery@motleyrice.com](mailto:mdl2804discovery@motleyrice.com) and [track2opioddefendants@reedsmit.com](mailto:track2opioddefendants@reedsmit.com)

Dated: August 31, 2020

/s/ Mark H. Lynch

Mark H. Lynch